

19cr313 ECT/TNL

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,)	INDICTMENT
)	
Plaintiff,)	18 U.S.C. § 922(g)(5)
)	18 U.S.C. § 924(a)(2)
v.)	18 U.S.C. § 924(d)(1)
)	28 U.S.C. § 2461(c)
SANTOS GOMEZ PEREZ,)	
)	
Defendant.)	

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Possession of Firearms by an Illegal Alien)

On or about March 14, 2019, in the State and District of Minnesota, the defendant,

SANTOS GOMEZ PEREZ,

knowing that he was an alien illegally and unlawfully in the United States, did knowingly possess eleven firearms, in and affecting interstate and foreign commerce, namely: (1) a Smith & Wesson, model M&P 9c, 9 millimeter semi-automatic handgun, serial number HUU4334; (2) a Smith & Wesson, model SW40VE, .40 caliber semi-automatic handgun, serial number DUM3526; (3) a Smith & Wesson, model 657, .41 magnum caliber revolver, serial number AUL4774; (4) a Taurus, model PT 111 G2A, 9 millimeter semi-automatic handgun, serial number TLS54596; (5) a Taurus, model PT 738, .380 caliber semi-automatic handgun, serial number 1D131257; (6) a Taurus, model "The Judge," .45LC/410 caliber revolver, serial number BM573618; (7) a Hi-Point, model 995, 9 millimeter caliber

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rifle, serial number F05502; (8) a Stag Arms, model Stag-15, multi-caliber rifle, serial number S042259; (9) a Norinco, model Mak-90, 7.62 caliber rifle, serial number 618845; (10) a Palmetto State Armory, model PA-15, multi-caliber rifle, serial number LW155871; and (11) a Tula Arsenal, 7.62 caliber rifle, serial number KB877, all in violation of Title 18, United States Code, Sections 922(g)(5) and 924(a)(2).

FORFEITURE ALLEGATION

If convicted of Count 1 of this Indictment, the defendant,

SANTOS GOMEZ PEREZ,

shall forfeit to the United States any firearms, ammunition and accessories involved in or used in connection with such violation including, but not limited to: (1) a Smith & Wesson, model M&P 9c, 9 millimeter semi-automatic handgun, serial number HUU4334; (2) a Smith & Wesson, model SW40VE, .40 caliber semi-automatic handgun, serial number DUM3526; (3) a Smith & Wesson, model 657, .41 magnum caliber revolver, serial number AUL4774; (4) a Taurus, model PT 111 G2A, 9 millimeter semi-automatic handgun, serial number TLS54596; (5) a Taurus, model PT 738, .380 caliber semi-automatic handgun, serial number 1D131257; (6) a Taurus, model "The Judge," .45LC/410 caliber revolver, serial number BM573618; (7) a Hi-Point, model 995, 9 millimeter caliber rifle, serial number F05502; (8) a Stag Arms, model Stag-15, multi-caliber rifle, serial number S042259; (9) a Norinco, model Mak-90, 7.62 caliber rifle, serial number 618845; (10) a Palmetto State Armory, model PA-15, multi-caliber rifle, serial number LW155871; and (11) a Tula Arsenal, 7.62 caliber rifle, serial number KB877; and all associated

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ammunition and accessories, all pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON